

EXHIBIT 12

From: [Olivia Flechsig](#)
To: [Sarah Fan](#); [Robert Mussig](#); [Tracey Kennedy](#)
Cc: [Dolores Leal](#); [Angie Paz](#); [Josie Pena](#)
Subject: Notice of Plaintiff Mark Snookal's Ex Parte Application for Leave to Supplement Opposition to Defendant Chevron U.S.A. Inc.'s Motion for Summary Judgment, etc.
Date: Wednesday, November 20, 2024 2:41:06 PM

Dear Counsel,

Pursuant to Local Rule 7-19.1 and Judge Vera's Civil Standing Order Sections XIII, and further to my voicemail to Sarah Fan earlier this afternoon, please be advised that Plaintiff will be filing an Ex Parte Application for Leave to Supplement Opposition to Defendant Chevron U.S.A. Inc.'s Motion for Summary Judgment, Leave to Take Further Discovery, and Leave to File a Motion Seeking Discovery Sanctions Against Defendant and Its Counsel today. This Ex Parte Application is based, in large part, on Chevron's inexcusably late production of, *inter alia*, CUSA000816-948 which deprived Plaintiff of an opportunity to seek related discovery and to use same to oppose material misrepresentations of facts made in Defendant's Motion for Summary Judgment. Namely, that no Chevron U.S.A. Inc. employee was involved in the discriminatory decision to deem Mr. Snookal "unfit for duty" in Escravos, and that no managing agent was involved in same.

Per Judge Vera's civil standing order, you will have 24-hours, subject to Rule 6(a)(2) from the time it is filed to file an opposition, if any. **Please advise ASAP regarding whether you plan to oppose this Ex Parte Application or not so that we can advise the Court accordingly.**

Sincerely,
Olivia

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